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***Attorneys for Plaintiff and Counter Defendant
Rimini Street, Inc., and Counter Defendant
Seth Ravin***

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RIMINI STREET, INC., a Nevada corporation,

Plaintiffs,

v.

ORACLE INTERNATIONAL
CORPORATION, a California corporation,

Defendant,

v.

ORACLE INTERNATIONAL
CORPORATION, and Oracle America, Inc.

Counter Claimants,

v.

RIMINI STREET, INC., and SETH RAVIN

Counter Defendants.

Case No. 2:14-cv-01699-LDG-VCF

**PLAINTIFF'S UNOPPOSED MOTION
REGARDING THE CONFIDENTIALITY
OF NON-PUBLIC RIMINI CLIENT
NAMES IN DKT. 157-1**

Pursuant to the Stipulated Protective Order governing confidentiality of documents entered by the Court on May 18, 2015 (*See* Dkt. 58, "Protective Order"), Local Rule 10-5(b) and Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Plaintiff/Counter-Defendant Rimini Street, Inc. and Counter-Defendant Seth Ravin (collectively "Rimini") respectfully request that the Court enter an Order directing that the identities of undisclosed Rimini clients contained within Exhibit 7 of the Declaration of Ryan Dykal (Dkt. 157-1) be filed under seal.¹

On April 16, 2016, Oracle filed a "Declaration of Nitin Jindal in Support of Oracle's Memorandum of Points and Authorities in Response to Court Order (Dkt. 201) and in Support of

¹The Protective Order provides that: "Counsel for any Designating Party may designate any Discovery Material as "Confidential Information" and as "Highly Confidential Information-Attorneys' Eyes Only" under the terms of the Protective Order only if such counsel in good faith believes that such Discovery Material contains such information and is subject to protection under Federal Rule of Civil Procedure 26(c). The designation by any Designating Party of any Discovery Material as "Confidential Information" or "Highly Confidential Information- Attorneys' Eyes Only" shall constitute a representation that an attorney for the Designating Party reasonably believes there is a valid basis for such designation". Protective Order at Paragraph 2.

1 Motion to Seal (Dkt. 155).” Dkt. 205. Exhibit A to Mr. Jindal’s declaration (Dkt. 205-1) is a
 2 redacted copy of Exhibit 7 to the Declaration of Ryan Dykal (Dkt. 157-1). Exhibit A “remove[s]
 3 only the Oracle employee names from Oracle’s Initial Disclosure” and “*five Rimini customer names*
 4 *that . . . were not relevant to Rimini’s use of the exhibit and that . . . Rimini considers to be*
 5 *confidential.*” Dkt. 205 (emphasis added).

6 It is undisputed that the five Rimini clients redacted by Oracle in Exhibit A to Mr.
 7 Jindal’s declaration have not been disclosed to the public.

8 On April 19, the Court entered an Order stating, “No later than April 27, 2016, Oracle
 9 SHALL FILE A REDACTED VERSION OF EXHIBIT 7, which obscures only the *employee names*
 10 on its FRCP 26(s) disclosures.” (Dkt. 208). The Court’s Order does not expressly address the five
 11 non-public Rimini client names.

12 The identities of non-public Rimini clients are highly confidential and proprietary
 13 competitive business information. Rimini, therefore, requests that the names of the five Rimini
 14 Clients removed in Exhibit A to Mr. Jindal’s declaration be redacted when Oracle publicly files
 15 Exhibit 7 pursuant to the Court’s April 19 Order.²

16 Oracle does not oppose this motion.

17 For the foregoing reasons, Rimini respectfully requests that the Court enter an Order
 18 as follows:

- 19 1. The unredacted Exhibit 7 (Dkt. #157-1), attached to the Declaration of Ryan Dykal
 20 (Dkt. #157) as an exhibit to the parties’ Joint Status Report (Dkt. #156), shall remain
 21 under seal.

22
 23 ² The Protective Order provides that: “Counsel for any Designating Party may designate any
 24 Discovery Material as ‘Confidential Information’ or ‘Highly Confidential Information – Attorneys’
 25 Eyes Only’ under the terms of this Protective Order **only if such counsel in good faith believes that**
 26 **such Discovery Material contains such information and is subject to protection under Federal**
 27 **Rule of Civil Procedure 26(c).** The designation by any Designating Party of any Discovery
 28 Material as ‘Confidential Information’ or ‘Highly Confidential Information –Attorneys’ Eyes Only’
 shall constitute a representation that an attorney for the Designating Party reasonably believes there
 is a valid basis for such designation.” Protective Order ¶ 2 (emphasis supplied).

2. No later than April 27, 2016, Oracle SHALL FILE A REDACTED VERSION OF EXHIBIT 7, which obscures (1) the employee names on its FRCP 26(s) disclosures, and (2) the five non-public Rimini client names identified in Exhibit A to the Declaration of Nitin Jindal (Dkt. 205-1). Oracle shall also link these new filings in CM/ECF to the Joint Status Report (Dkt. #156) and the Declaration of Ryan Dykal (Dkt. #157).

DATED: April 21, 2016

SHOOK, HARDY & BACON

By: /s/ Ryan D. Dykal

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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of April, 2016, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, District of Nevada, using the electronic case filing system. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

By: /s/ Ryan D. Dykal
Ryan D. Dykal.
Attorney for Plaintiff/Counter-Defendants
Rimini Street, Inc., and Seth Ravin

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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Plaintiffs,

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Case No. 2:14-cv-01699-LDG-VCF

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S UNOPPOSED MOTION
REGARDING THE CONFIDENTIALITY
OF NON-PUBLIC RIMINI CLIENT
NAMES IN DKT. 157-1**

[PROPOSED] ORDER

Pending before this Court is Plaintiff Rimini's Unopposed Motion Regarding the Confidentiality of Non-Public Rimini Client Names in Dkt. 157-1. Having considered Rimini's Motion:

IT IS HEREBY ORDERED THAT:

3. The unredacted Exhibit 7 (Dkt. #157-1), attached to the Declaration of Ryan Dykal (Dkt. #157) as an exhibit to the parties' Joint Status Report (Dkt. #156), shall remain under seal.
4. No later than April 27, 2016, Oracle SHALL FILE A REDACTED VERSION OF EXHIBIT 7, which obscures (1) the employee names on its FRCP 26(s) disclosures, and (2) the five non-public Rimini client names identified in Exhibit A to the Declaration of Nitin Jindal (Dkt. 205-1). Oracle shall also link these new filings in

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1 CM/ECF to the Joint Status Report (Dkt. #156) and the Declaration of Ryan Dykal
2 (Dkt. #157).
3

4 IT IS SO ORDERED.

5 DATED: April 25, 2016

6 By:

Magistrate Judge Peggy A. Leen

